

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

VOLKSWAGEN GROUP OF AMERICA, INC.,

Plaintiff,

v.

Civil Action No. 1:19-cv-01574

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

**PLAINTIFF'S *EX PARTE* MOTION FOR TEMPORARY ASSET RESTRAINT
AND EXPEDITED DISCOVERY**

Plaintiff Volkswagen Group of America, Inc. by counsel and pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65, hereby moves for a Temporary Restraining Order, including a temporary asset restraint and expedited discovery.

For the reasons set forth in Plaintiff's accompanying memorandum, Plaintiff respectfully requests that this Court (1) issue a temporary restraining order freezing the assets of Defendants' PayPal accounts; and (2) permit limited expedited discovery directed to eBay and PayPal in order to determine Defendants' identity, the amount and location of the profits of Defendants' counterfeiting and infringement, and the scope of Defendants' activities.

Date: December 13, 2019

Respectfully submitted,

/s/ Monica Riva Talley

Monica Riva Talley (VSB No. 41840)

Daniel E. Yonan (VSB No. 46019)

Nicholas J. Nowak (*pro hac pending*)

Daniel S. Block (*pro hac pending*)

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